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Attorneys for Judgment Creditor

AIRLINES REPORTING CORPORATION

## UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

## AIRLINES REPORTING CORPORATION,

ORTING CORPORATION,

Plaintiff/Judgment Creditor,

v.

COMMERCIAL TRAVEL CORPORATION d/b/a MATLOCK TRAVEL, et al.,

Defendants/Judgment Debtors.

Case No. 08-MC-00088

## NOTICE OF HEARING RE: MOTION FOR AN ASSIGNMENT ORDER

Date: July 14, 2008 Time: 10:30 a.m. Ctrm: 1, 4<sup>th</sup> Floor

Judge: Hon. Irma E. Gonzalez

NOTICE IS HEREBY GIVEN that on July 14, 2008 at 10:30 a.m., or as soon thereafter as this matter may be heard before the Honorable Irma E. Gonzalez in Courtroom 1, 4th Floor of the United States District Court, located at located at 940 Front Street, San Diego, California 92101, Judgment Creditor AIRLINES REPORTING CORPORATION ("Creditor ARC") will and hereby does move this Court, under Federal Rules of Civil Procedure Rule 69 and California Code of Civil Procedure \$708.510 and \$709.020, for an order against Judgment Debtor MARIO RENDA ("Debtor Renda"):

- (1) Assigning any and all rights, title and interest of Debtor Renda in any money or property now due, or to become due, from the judgment entered in the case entitled <u>Renda v. Nevarez</u>, Superior Court of California, County of San Diego, Case No. GIC798346.
- (2) Assigning any and all rights, title and interest of Debtor Williams in any money or property now due, or to become due, from the currently pending lawsuit filed on

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September 25, 2007 in the case entitled Renda v. Nevarez, et al. (II), Superior Court of
California, County of San Diego, Case No. 37-2007-00075627-CU.
Directing Debtor Renda to pay any and all money or property due, or to become due,
under the assignment order, directly to Creditor until the amount remaining due on the

\$701,942.81 judgment, plus all accrued interest and costs thereon, is paid in full.

PLEASE TAKE FURTHER NOTICE that this motion is made pursuant to a judgment entered by the United States District Court, Eastern District of Virginia, which was registered in this Court, Debtor's refusal to voluntarily pay the judgment, Debtor's receivables, Federal Rules of Civil Procedure Rule 69 and Code of Civil Procedure §§708.510, 709.020, and on the grounds that the judgment against Debtor is final, conclusive, and remains unsatisfied.

PLEASE TAKE FURTHER NOTICE that this motion is based on this Notice and Motion, the pleadings, records and files in this action, the accompanying Memorandum of Points and Authorities, Exhibits and the Declarations and on such evidence as may be presented at the hearing on this motion.

Respectfully submitted,

DATED: May 23, 2008 **SAMPSON & ASSOCIATES** 

> By: /s/ Bryan D. Sampson

Attorneys for Judgment Creditor

E-Mail: bsampson@sampsonlaw.net